

West Street
Cincinnati, Ohio 45215
513/733-2100

US EPA RECORDS CENTER REGION 5



445239

Thiokol / CARSTAB CORPORATION

September 14, 1982

Ms. Kathleen Homer
Waste Management Branch
United States Environmental
Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

Certified Mail

Dear Ms. Homer,

Re: OHD000724138
Carstab Corporation
1560 West Street
Cincinnati, Ohio 45215

acknowledge receipt of the March 31, 1982 letter from Region V requesting the submission of our Part B application under RCRA by September 30, 1982. This letter will serve to notify you that effective October 1, 1982 we intend to revert to generator status from our existing TSD status for the following reasons:

1. The one waste treatment item on our permit (T01 59,000 gallons/day) is no longer a current operation because of a process change. This was the only non-storage item on our permit.
2. The storage of waste in tanks has been reduced from two facilities (17,000 gallons total capacity) to one facility (12,000 gallons capacity). We have been able to make this change because the material stored in the 5,000 gallon tank is beneficially recycled as part of our process and so should not be considered a RCRA hazardous waste.

Per your request I have attached a copy of our original Interim Status Closure Plan. To update this, we now have only three waste facilities on site - two drum storage pads and one 12,000 gallon bulk tank. We have been operating our drum storage area as if the 90 day limit were in effect already and do not anticipate any problem in operating in this manner. The waste in the 12,000 gallon tank is currently being beneficially recycled by a third party.

Thank you for your assistance in the making of the decision regarding the best status for our particular circumstances. Should you need clarification on any point please call me on (513) 733-2220 (direct). Thank you.

Yours faithfully,

Raymond F. Phillips, Ph.D.
RCRA Coordinator

RFP/njk
Attachment

cc: Mr. Bob Fragale
OEPA/HWFAB

bcc: R. S. Binns
J. A. Mazzei
M. D. Padgett
R. C. Witman
J. P. Coffin - Newtown

A SUBSIDIARY OF THIOKOL CORPORATION

West Street
Cincinnati, Ohio 45215
513/554-1554

Thiokol / CARSTAB CORPORATION

CLOSURE PLAN FOR THIOKOL/CARSTAB CORPORATION, READING, OHIO

RCRA Part 265, Subpart G, Closure and Postclosure

DESCRIPTION OF SITE

Thiokol/Carstab Corporation owns and operates a chemical manufacturing plant for the production of additives for the plastics and petroleum industry. The site also houses Carstab Corporation Research & Development facilities and has a headquarters building for Administrative and Marketing personnel. Approximately 250 people are employed on the site.

HAZARDOUS WASTE FACILITIES

As of November 19, 1980, there were five hazardous waste TSD facilities on site. Two areas are dedicated to drum storage of wastes prior to being shipped to permitted TSD facilities. There are two bulk storage facilities for hazardous waste being stored prior to recycling or shipment to a TSD facility. The fifth facility is a treatment tank where organics are removed by separation from water which is then discharged to the Metropolitan Sewer District of Greater Cincinnati.

The larger of the storage areas for drummed waste measures 130 ft. x 65 ft. The other area measures only 24 ft. x 12 ft. but is part of a larger storage area for raw materials and process intermediates. Both storage areas combined are capable of holding approximately 6,400 drums. It is anticipated that the storage areas will hold less than 50% of the maximum capacity at any one time. The additional capacity needed in the event that inclement weather or administrative problems delay shipments of hazardous wastes to permitted TSD facilities.

The waste water from one particular process is treated to remove insoluble organics at the rate of 59,000 gallons/day. This unit does not run continuously: it is used only when one special type of process is being run in production.

A 5,000 gallon storage tank holds ignitable waste prior to recovery and a reactive waste is stored in a 12,000 gallon tank. It is anticipated that in both cases these hazardous wastes will be beneficially recycled within the Carstab operation and that shipments to permitted TSD facilities will not be required.

CLOSURE PROCEDURE

If this production facility should ever be closed in the future, all hazardous waste activities and areas will be decontaminated and all residues will be shipped to a permitted TSD facility. Specifically, the storage areas after all drums have been

shipped will be cleaned of all residual leakage and all cleanup materials will be sent to a permitted TSD facility.

If any of the three bulk storage facilities have material remaining, this will be drummed off and sent to a permitted TSD facility. All bulk tanks will be decontaminated and all cleaning materials will be drummed and also sent to a permitted TSD facility.

CERTIFICATION OF CLOSURE

When any future closure of TSD activities has been completed, Carstab will submit to the Regional EPA Administrator a certificate signed by a responsible Carstab official and an independent registered professional engineer that the facility has been closed in accordance with this closure plan.

A handwritten signature in black ink, appearing to be 'RFP' or similar, located at the bottom left of the page.

RFP:cg

West Street
Cincinnati, Ohio 45215
513/733-2100

RFP

Thiokol / CARSTAB CORPORATION

September 14, 1982

Mr. Bob Fragale
Hazardous Waste Facility
Approval Board
P.O. Box 1049
361 E. Broad Street
Columbus, Ohio 43216

Dear Mr. Fragale,

Attached is a copy of a letter to the U.S. EPA detailing our decision to revert to generator status effective October 1, 1982. As a consequence of this decision we will not be renewing our Permit 05-31-0227 due on 10/1/82.

Should you have any questions regarding this matter please call me on (513) 733-2220 (direct).

Yours faithfully,

R. F. Phillips

Raymond F. Phillips, Ph.D.
RCRA Coordinator

RFP/njk

Attachment

cc: Mr. James Flautt
Ohio EPA
Permits and Manifest
Records Section

Certified Mail

bcc: R. S. Binns
J. A. Mazzei
M. D. Padgett
R. C. Witman
J. P. Coffin - Newtown